

February 18, 2013

Federal Election Commission
999 E Street NW
Washington, DC 20436

MUR # 6724

FEDERAL ELECTION COMMISSION
2013 FEB 21 PM 3:12
OFFICE C - CIVIL RIGHTS
CIVIL RIGHTS

RE: Revised Complaint against Bachmann for President Committee and MichelePAC

Dear Commission,

The following complaint was revised to reflect the correct "...*Subscribed and sworn to before me*," wording of the notary certificate. Further I refined the language of the complaint for easier reading.

I was the National Field Coordinator for Bachman for President (hereafter, "BFP") between July 2011 and January 2012. I witnessed the following five serious violations of FEC statutes:

1. It appears that a deliberate effort was made by BFP to conceal payments made to the IA State Chairman, Senator Kent Sorenson.
2. BFP National Political Director Guy Short received monthly payments from MichelePAC for which he was the Executive Director. He was paid in the months of December 2011 and January 2012 exclusively by MichelePAC while at the same time he directed BFP staff and managed Caucus operations in BFP Urbandale, IA headquarters.
3. Direct coordination between a Super PAC and a BFP Senior Advisor.
4. A violation of whistle-blowing statutes.
5. Refusal to pay one-year old debts listed on BFP FEC Reports to vendors who cooperate with the police or other legal entity (lawyers or other official bodies investigating Rep. Michele Bachmann (R-MN), Bachmann for President, MichelePAC, Senator Kent Sorenson, and Mr. Guy Rogers.

I have a responsibility to report the following issues to the Commission:

1. Bachmann for President ("BFP") apparently paid its IA chairman, Sen. Kent Sorenson, \$7,500 a month through a third party in an apparent effort to disguise payments. Payments were regular until he defected to presidential candidate U.S. Rep. Ron Paul.

As evidence, I point the Commission to the FEC reports for the entire year 2011 for BFP and payments made to C&M Strategies, Inc., a Colorado corporation, operated by Mr. Guy Short.

As evidence, I point the Commission to the FEC reports filed by MichelePAC and payments made by MichelePAC to C&M Strategies, Inc.

To verify, the FEC could request a copy of the agreement among and between Kent Sorenson, C&M Strategies, Inc., Guy Short and BFP and MichelePAC. I believe that a copy is on file at BFP.

To verify, the FEC could audit the deposits and payments made by BFP and MichelePAC to C&M Strategies Inc. from June 2011 through January 2012 to determine if C&M Strategies paid Sen. Kent Sorenson \$7,500/month plus expenses and if Mr. Guy Short was being paid \$20,000/month in combination from MichelePAC and Bachmann for President.

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2. MichelePAC paid C&M Strategies, Inc. \$20,000 on/about December 06, 2011 and January 3, 2012. Mr. Guy Short functioned and performed duties as BFP's National Political Director in the BFP IA office in Urbandale in December 2011 and supervised Caucus strategy in January 2012.

As evidence, I point you to the FEC reports for the entire year of 2011 for MichelePAC.

As evidence, I point you to witnesses, to include, myself in the BFP IA office who can testify that Mr. Short in his capacity as BFP National Political Director supervised operations full time in the IA BFP office in Urbandale, IA, in December 2011 and managed Caucus deployment in January 2013.

As evidence, I point you to the FEC reports for the entire year of 2011 for BFP. C&M Strategies, Inc. is listed as a debt for expenses incurred December 2011.

Mr. Short claimed to the media that he was a volunteer who gave his time to the Bachmann for President Campaign. Please determine if a "National Political Director" may volunteer his time and not be listed as debt except for his expenses while living in Iowa, and then, allowed to be paid \$20,000 for the same month from MichelePAC headquartered in Minnesota, which is directly connected to the Presidential Candidate, Representative Michele Bachmann.

3. BFP Speech Coach Brett O'Donnell coordinated media buys and placement with "NFC Super PAC" located near Nashville, TN.

As evidence, I point you to my eye-witness account, detailed later in this narrative.

4. BFP has not paid as of 1/13/2013 the following firms listed on the BFP FEC final filing.

Vertical Horizons One, Inc., FL.
Vero Consulting, IA
Capitol City Partners, DC.

BFP has not paid as of 1/13/2013 Contractor Drew Klein and Contractor Barbara Heki, IA, who are not listed on the final BFP FEC report.

5. Subsequent to December 1, 2012, or 11-months after the January 3, 2012 IA Caucus, BFP Finance Chairman James Pollack requires that unpaid staffers/contractors (see "4" above) sign a Non-Disclosure Agreement ("NDA") that prohibits interviews or cooperation with legal entities (i.e., lawyers and law enforcement) without first speaking with BFP legal counsel.

Collateral Evidence: I am prepared to provide an affidavit, provide a list of witnesses, a copy of the NDA, newspaper articles, and cooperate with the Commission in the execution of its lawful duties.

Narrative:

1a. I submit to you that according to reports filed with the FEC, C&M Strategies, Inc. was paid \$22,500 per month by BFP.

1b. I submit to you that according to FEC reports filed by MichelePAC, C&M Strategies, Inc. was paid \$5,000 a month. The combined monthly income received by C&M Strategies, Inc. was \$27,500.

I respectfully submit that Mr. Short and/or C&M Strategies paid IA Sen. Sorenson \$7,500, which was common knowledge among the IA presidential staff.

2a. I submit to you that Mr. Short had a conflict of interest because he served MichelePAC as Executive Director for which his firm, C&M Strategies, received \$5000 payments per month from MichelePAC and payments of \$20,000 in December 2011 and January 2012.

At the same time, Mr. Short was paid \$22,500 per month by BFP as National Political Director except for the month of December 2011 when he received zero -0-.

2b. Mr. Short told the IA Presidential Staff and the media that he was a "volunteer" in December 2011. His unexpected announcement to be a "volunteer" came after BFP Campaign Manager Keith Nahigian asked the staff to defer compensation for December 2011 until later in the month or after the New Year (January 2012). Some BFP senior advisors and staffers deferred compensation to help the candidate. Mr. Guy Short paid himself \$20,000 on December 5, 2011 and again on January 3, 2012 from MichelePAC. This fact was not known until FEC reports were filed by MichelePAC.

2c. BFP FEC reports show that C&M Strategies, Inc. was reimbursed by BFP for December 2011 expenses incurred by Mr. Guy Short while serving in the BFP Urbandale, IA, office.

3a. I witnessed a conversation between NFC Super PAC President Bill Hemrick and BFP Senior Advisor and Speech Coach Brett O'Donnell during which Mr. Hemrick sought Mr. O'Donnell's advice with regard to media buys in the Des Moines market. Mr. O'Donnell advised Mr. Hemrick of which radio and TV stations to buy time.

This conversation took place at the BFP Urbandale, IA office at the end of Candidate Bachmann's 99-country bus tour. I and others were surprised to witness the conversation between the two men outside of the bus near the candidate's entourage. Earlier in the evening, Mr. Hemrick had been warned by two BFP senior advisors not to discuss NFC Super PAC activity or seek advice from the candidate, senior advisors and staff.

4a. Two of the three firms – Vertical Horizons One, Inc., and Capitol City Partners, LLC, – were interviewed by attorneys and investigators involved in a lawsuit and a criminal investigation in Iowa.

A former staffer, Barbara Heki, is party to a lawsuit against BFP in Iowa.

Additionally, BFP sent a "release" (Non-Disclosure Agreement) to various unpaid Iowa staff requiring them to promise to call BFP before responding to any law enforcement inquiries if they wanted to be paid. The release also included a gag order and agreement not to sue.

The FEC could investigate whether the identified firms and individuals hired by BFP are victims of discrimination for cooperating with legal entities involved in the civil lawsuit and criminal investigation by Urbandale, IA, police.

The FEC could investigate whether BFP is guilty of violating whistleblower statutes that prohibit punitive behavior toward BFP employee or firm because of any cooperation or complaint filed with officials in a legal matter or criminal investigation.

5a. Each staff member/contractor performed the duty required by BFP in consideration of compensation agreed between the staffer/contractors. The agreed compensation remains unpaid.

5b. Nearly one year after the performance of agreed duties, BFP requires without consideration a signature on a Non-Disclosure Agreement ("NDA"). The NDA requires that each unpaid staffer/contractor first speak to BFP counsel before cooperating with attorneys and criminal investigators.

5c. The FEC could investigate whether the identified firms and contract staff are victims of extortion in an effort to suppress information relating to a civil lawsuit and/or a criminal investigation in Iowa.

Respectfully,

Peter Waldron
National Field Coordinator, Bachmann for President
C/o Vertical Horizons One, Inc.
1334 Tampa Road #195
Palm Harbor, FL 34683

The contents of this complaint are true to the best of my knowledge.

Subscribed and sworn to before me on this 19 day of FEB, 2013.

NOTARY PUBLIC-STATE OF FLORIDA
Joseph M. Broadus
Commission # DD882211
Expires: APR. 20, 2013
BONDED THRU ATLANTIC BONDING CO., INC.